

## **South Coast Air Quality Management District**

## Engineering & Compliance

Policies & Procedures

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT MEMORANDUM

**DATE:** November 15, 1984

**TO:** Engineering Division Technical Staff

FROM: Sanford M. Weiss, Director of Engineering /s/SMW

**SUBJECT:** Exempt Solvents

Regulation XIII, and Rule 1122, describe certain compounds as being "exempt." These materials include methane, 1,1,1-trichloroethane, methylene chloride, trifluoromethane and chlorinated-fluorinated hydrocarbons. Regulation XIII allow for unlimited use of these materials and Rule 1122, Solvent Cleaners, exempts the degreasers from the various mechanical requirements when using these solvents.

The commercially used compounds that are "exempt" contain additives which are used as stabilizers and/or inhibitors. These items may be photochemically reactive. In addition, there may also be minor amounts of other non-exempt materials added to these compounds as "co-solvents." The two (2) rules do not make any provision for the additional additives. During the rule making process, the District had knowledge of these added materials and intended that minor amounts of stabilizers/inhibitors be allowed to be used.

For the purpose of Rule 1122, there can be up to a maximum of 10% inhibitors/stabilizers/co-solvents in the exempt solvent and the total compound will be considered to be exempt. For the purposes of Regulation XIII, the compound must be divided between its exempt components and the non-exempt portion. For completing the Regulation XIII emission inventory, the non-exempt portion will be counted toward a company's maximum allowed hydrocarbon limit. In addition, if the amount of non-exempt photochemically reactive material is greater than 1 pound per day, the additional requirements of Regulation XIII will be actuated (BACT).

